

FILED IN THE  
U.S. DISTRICT COURT  
EASTERN DISTRICT OF WASHINGTON

FEB 09 2010

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YAKIMA, WASHINGTON

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UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF WASHINGTON

UNITED STATES OF AMERICA,

Plaintiff,

vs.

CLINTON LEE HALBERT,  
WRIGHT CHRISTOPHER HALBERT,

Defendants.

**CR-09-0172-LRS**

SUPERSEDING INDICTMENT

Vios: Ct. 1: 21 U.S.C. § 846-  
Conspiracy to Manufacture a  
Controlled Substance

Ct. 2: 21 U.S.C. § 841(a)(1)-  
Manufacture of Marijuana

21 U.S.C. § 853  
Notice of Forfeiture  
Allegations

The Grand Jury charges:

COUNT 1

Beginning on a date unknown, but by at least on or about May 2, 2006, through on or about December 11, 2009, in the Eastern District of Washington and elsewhere, the Defendants, CLINTON LEE HALBERT, WRIGHT CHRISTOPHER HALBERT, and others, known and unknown to the Grand Jury, did knowingly and intentionally conspire, confederate and agree with each other and others to commit the following offense against the United States, to wit: to knowingly and intentionally manufacture in excess of 50

1 marijuana plants; in violation of Title 21, United States Code,  
2 Section 841(a)(1), and did aid and abet said conspiracy and  
3 agreement; all in violation of Title 21 United States Code,  
4 Section 846 and Title 18, United States Code, Section 2.

5 COUNT 2

6 On or about December 11, 2009, in the Eastern District of  
7 Washington, the Defendants, CLINTON LEE HALBERT and WRIGHT  
8 CHRISTOPHER HALBERT, did knowingly and intentionally manufacture  
9 at least 50 marijuana plants, a Schedule I controlled substance,  
10 all in violation of Title 21, United States Code, Section  
11 841(a)(1), and Title 18, United States Code, Section 2.

12 NOTICE OF CRIMINAL FORFEITURE

13 The allegations contained in Count 1 of this Indictment are  
14 hereby realleged and incorporated by reference for the purpose of  
15 alleging forfeiture pursuant to Title 21 United States Code,  
16 Section 853.

17 Pursuant to Title 21 United States Code, Section 853, upon  
18 conviction of an offense in violation of Title 21 United States  
19 Code, Section 846, the Defendants, CLINTON LEE HALBERT, and  
20 WRIGHT CHRISTOPHER HALBERT, shall forfeit to the United States of  
21 America, any property constituting or derived from any proceeds  
22 obtained directly or indirectly as a result of the such offenses  
23 and any property used or intended to be used, in any manner or  
24 part, to commit or to facilitate the commission of the  
25 offense(s). The property to be forfeited includes, but is not  
26 limited to, the following:

1        REAL PROPERTY

2        Parcel Number 2378800, located in Stevens County, State of  
3        Washington, legally described as follows:

4  
5        That part of the W ½ of the NW ¼ of the SE ¼ of Section 19,  
6        Township 39 North, Range 39 East, W.M., in Stevens County,  
7        Washington, described as follows:

8  
9        Beginning at a point on the North line of said W ½ located South  
10      89°31'57" East 513.44 feet from the Northwest corner of said W ½  
11      ; thence South 89°31'57" East 147.00 feet to the Northeast corner  
12      of said W ½; thence South 00°10'04" East 360.00 feet along the  
13      East line of said W ½; thence North 22°17'17" West 390.36 feet to  
14      the Point of Beginning.

15  
16      The E ½ of the NW ¼ of the SE ¼; and the E ½ of Government Lot 3  
17      of Section 19, Township 39 North, Range 39 East, W.M., in Stevens  
18      County, Washington.

19  
20      EXCEPT that part of said Lot 3 as outlined on print of Sheet No.  
21      1928, Columbia River Reservoir, Grand Coulee Dam, attached to  
22      Contract recorded in Book 108 of Deeds, Page 117.

23  
24      EXCEPT beginning at a point in the West line of said E ½ located  
25      South 00°10'04" East 1039.50 feet from the Northwest corner of  
26      said E ½; thence South 12°21'00" East 478.79 feet to the  
27      Northeasterly boundary of the Columbia River Reservoir; thence  
28

1 South 60°24'23" West 116.00 feet along said boundary to the West  
2 line of said E ½; thence North 00°10'04" West 525.00 feet along  
3 said West line to the Point of Beginning.

4  
5 That part of the West 100.00 feet of Government Lot 1 of Section  
6 19, Township 39 North, Range 39 East, W.M., in Stevens County,  
7 Washington, described as follows:

8  
9 Beginning at the Northeast corner of said Government Lot 3;  
10 thence North 00°14'35" West 721.10 feet; thence North 47,°45'21"  
11 East 134.56 feet; thence South 01°06'08" West 753.52 feet; thence  
12 South 42°06'06" West 122.08 feet to the East line of Government  
13 Lot 3; thence North 00°14'35" West 32.40 feet, more or less, to  
14 the Point of Beginning.

15  
16 TOGETHER WITH all appurtenances, fixtures, attachments, and  
17 improvements thereto or thereupon.

18  
19 SUBJECT TO any and all easements, restrictions and covenants of  
20 record.

21 PERSONAL PROPERTY

22 One 1980 Case 580c Loader Backhoe, Serial Number  
23 8986590, seized on or about December 11, 2009.

24  
25 If any of the above-described forfeitable property, as a result  
26 of any act or omission of the Defendants:

27 (a) cannot be located upon the exercise of due diligence;  
28

1 (b) has been transferred or sold to, or deposited with, a  
2 third party;

3 (c) has been placed beyond the jurisdiction of the court;

4 (d) has been substantially diminished in value; or

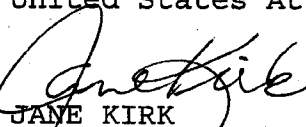
5 (e) has been commingled with other property which cannot be  
6 divided without difficulty;

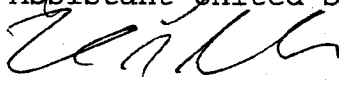
7  
8 the United States of America shall be entitled to forfeiture of  
9 substitute property pursuant to Title 21, United States Code,  
10 Section 853(p).

11  
12  
13 DATED this 9th day of February, 2010.

14  
15 A TRUE BILL

16  
17  
18 JAMES A. McDEVITT  
19 United States Attorney

20   
21 JANE KIRK  
22 Assistant United States Attorney

23   
24 THOMAS J. HANLON  
25 Assistant United States Attorney